John J. Lamb, Esq. Martin R. Kafafian, Esq.

BEATTIE PADOVANO, LLC

50 Chestnut Ridge Road, Suite 208 Montvale, New Jersey 07645

Telephone: (201) 573-1810

Attorneys for Amicus Curiae Concerned Citizens of Englewood, Inc.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

431 E PALISADE AVENUE REAL ESTATE, LLC and 7 NORTH WOODLAND STREET, LLC, on behalf of themselves and prospective residents, JOHN and JANE DOES 1-10,

Plaintiffs,

v.

CITY OF ENGLEWOOD and CITY COUNCIL OF ENGLEWOOD,

Defendants.

Civil Action No. 19-cv-14515 (BRM) (JAD)

Document electronically filed

STIPULATION AND (PROPOSED) CONSENT ORDER GRANTING THE CONCERNED CITIZENS OF ENGLEWOOD, INC. LEAVE TO APPEAR AS AMICUS CURIAE

THIS MATTER having been opened to the Court on the application of the Concerned Citizens of Englewood, Inc., a New Jersey non-profit corporation ("Concerned Citizens"), by and through its counsel, Beattie Padovano, LLC, for an Order granting the Concerned Citizens leave to appear in this matter as *amicus curiae*; and the Plaintiffs having moved for injunctive relief by Order to Show Cause; and Defendants' opposition to Plaintiffs' application for preliminary injunctive relief being due on or before August 21, 2019; and the Court having considered the

application for the entry of this Consent Order, the parties having consented to the form and entry of this Order, and good cause having been shown;

IT IS on this _____ day of August, 2019, stipulated and agreed between the undersigned attorneys for Plaintiffs, Defendants, and the Concerned Citizens that the Concerned Citizens may appear and participate in this action as *amicus curiae* to the full extent permitted under law.

AND IT IS FURTHER stipulated and agreed between the undersigned attorneys for Plaintiffs, Defendants, and the Concerned Citizens that the Concerned Citizens may (but has no obligation to) file a brief with respect to Plaintiffs' Order to Show Cause no later than August 28, 2019 (or within seven (7) days of the filing by Defendants of their Opposition Brief, which is due on August 21, 2019). This Stipulation and Consent Order shall not otherwise affect the briefing schedule set forth in this Court's July 25, 2019 Text Order.

BEATTIE PADOVANO, LLC

Attorneys for *Amicus Curiae*Concerned Citizens of Englewood, Inc.

By: <u>/s/ John J. Lamb</u> John J. Lamb, Esq.

Dated: August 14, 2019

COLE SCHOTZ P.C.

Attorneys for Plaintiffs

By: /s/ Michael R. Yellin Michael R. Yellin, Esq.

Dated: August 16, 2019

ANTONELLI KANTOR, P.C.

Attorneys for Defendants

By: <u>/s/ Daniel Antonelli</u> Daniel Antonelli, Esq.

Dated: August 20, 2019

SO ORDERED:

Honorable Brian R. Martinotti, U.S.D.J.

Dated: